

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**TEDDY STRATFORD APPAREL LLC,)
and BRYAN DAVIS,) Case No. 23-10799
)
Plaintiffs,)
)
vs.) Judge: Andrea R. Wood
)
THE ENTITIES listed on EXHIBIT 1,) Magistrate: Gabriel A. Fuentes
)
Defendants.)**

DECLARATION OF PATRICK M. JONES

I, Patrick M. Jones, an attorney with AEGIS Law, located in Chicago, Illinois, and over 18 years of age. I make this declaration in support of Plaintiff's *Ex Parte* Motion for Entry of Temporary Restraining Order (the "Motion for TRO") and, if called to testify as a witness under oath, I could and would competently testify as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois.
2. I have personal knowledge as to the statements set forth herein.
3. Plaintiff is seeking *ex parte* relief and is requesting service by email and electronic publication to Defendants identified on Exhibit 1 to Plaintiff's Complaint (collectively, the "Defendants"). Defendants operate websites and webstores to sell counterfeit products in violation of Plaintiff Teddy Stratford's registered trademarks, patents, and copyrights (the "Counterfeit Products"), and Defendants have misappropriated Plaintiff Davis's likeness.
4. Copies of the unpublished opinion issued by courts in this District granting substantially similar relief as that request by the Motion for TRO filed in this case are attached as

Exhibit A.

5. I, together with a third party service provider and with the assistance of the Plaintiffs, identified webstores and websites (the “Infringing Sites”) advertising for sale in the United States products displaying the Counterfeit Products and misappropriating Plaintiff Davis’s likeness. A list of the Infringing Sites and images showing the infringement is attached as Exhibit B, and filed under seal.

6. I, or someone with my firm under my supervision, reviewed each of the Defendant’s websites or webstores and concluded that they do violate one or more of the Plaintiffs’ intellectual property rights or Plaintiff Davis’ right to his likeness. The intellectual property infringed on each site is listed in the far-right column of Exhibit B.

7. By comparison, a screenshot of Plaintiff Teddy Startford’s homepage, www.teddystraford.com, is attached as Exhibit C.

8. It is clear from comparing the Teddy Stratford website to the Defendants’ websites that many if not all of the Defendants simply cut-and-pasted images created by Plaintiffs, including the likeness of Plaintiff Davis.

9. We also confirmed that each of the sites advertise and sell to customers located in this District. During the review process, we deleted over sixty (60) because, although they are infringing, they do not sell to U.S. customers.

10. Plaintiff confirmed to me that the Infringing Sites were not authorized to sell Plaintiff’s products or use Plaintiff’s intellectual property or Plaintiff Davis’s likeness.

11. Plaintiff and I conducted “test purchases” to confirm that the counterfeit products advertised on the Infringing Sites could be purchased using U.S. dollars and shipped to customers located in Chicago, Illinois.

12. Based on my prior experience representing both plaintiffs and defendants in similar cases, and my research of similar cases where brand owners who have identified websites and webstore listings selling counterfeit products, if Plaintiffs proceeds on normal advance notice prior to seeking to limit transfers out of the accounts maintained by payment processors and webstore host, *e.g.*, PayPal, Amazon, Walmart, Shopify, etc. (the “Primary Accounts”), as well as U.S. financial accounts linked to the Primary Accounts, *e.g.*, Stripe, Payoneer, Silicon Valley Bank, Chase, Mastercard Payment Gateway Services, traditional banks, etc. (the “Secondary Accounts”), Defendants will transfer funds, data, and content to other accounts beyond the reach of Plaintiffs and beyond the Court’s jurisdiction.

13. Such actions by Defendants would effectively defeat Plaintiffs’ ability to obtain meaningful relief and will continue to irreparably harm Plaintiffs through Defendants’ sale of Counterfeit Products and continued misappropriation of Plaintiff Davis’s image.

14. Upon entry of a Temporary Restraining Order in this matter, I will notify the Defendants by sending copies of Plaintiff’s *Ex Parte* Motion for TRO and supporting papers via-mail to the e-mail addresses provided by the Defendants to the websites responsible for hosting their respective websites and webstores.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

By: /s/ Patrick M. Jones
Patrick M. Jones, one of the
attorneys for the Plaintiff

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